



City of Seattle
Edward B. Murray, Mayor

Department of Planning and Development
D. M. Sugimura, Director

**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR OF
THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Application Number: 3018266

Applicant Name: Andrew Hickman, TCF Architecture for Seattle Public Schools (SPS)

Address of Proposal: 1700 East Union Street

SUMMARY OF PROPOSED ACTION

Land Use Application to demolish a 6,750 square foot portion of existing institution and to allow 9,633 square foot in additions to existing structure (T.T. Minor School). Existing paved play area to be restriped to provide an additional 35 surface parking spaces for a total of 57. An addendum to Seattle Public Schools Building Excellence Phase IV (BEX IV) Capital Improvement Program EIS has been prepared by Seattle Public Schools.

The following approval is required:

SEPA – For conditioning only - Chapter 25.05, Seattle Municipal Code.

SEPA DETERMINATION: ☐ Exempt ☐ DNS ☐ MDNS ☒ EIS*

☐ DNS with conditions

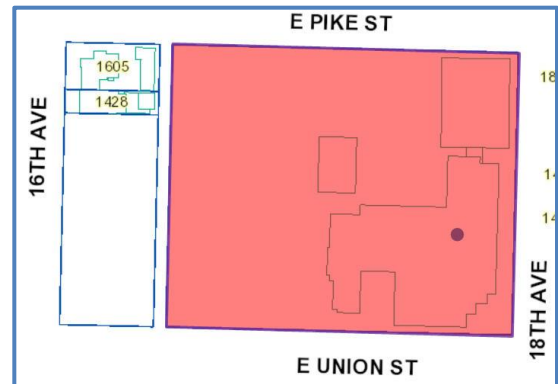
☐ DNS involving non-exempt grading or demolition, or
 another agency with jurisdiction.

*SEPA Addendum to BEX IV Revised Final Programmatic EIS Seattle World School at T.T. Minor. Seattle Public Schools has prepared an addendum to the BEX IV Revised Final Programmatic EIS. It adds information to the EIS relating to the proposed T.T. Minor school Project. The information set forth in the addendum does not substantially change the analysis of significant impacts and alternatives in the BEX IV Revised Final Programmatic EIS (SPS, 2012).

BACKGROUND DATA

Site Location

The existing T. T. Minor School located on a 3.5 acre site at 1700 East Union Street, is bounded by East Pike Street to the north, 18th Avenue to the east, East Union Street to the south and by a 16 foot wide alley to the west. The school property is somewhat level and slightly elevated from street grade.



Zoning

The proposal is located in a Lowrise 3 (LR 3) zone.

Proposal Information

Seattle Public Schools (SPS) proposes to locate the Seattle World School, an alternative SPS high school program, at the site. The project proposal is primarily an interior remodel with a minor expansion of 2,085 square feet for the multi-purpose room and 1,917 square feet for administrative office. Site work is proposed to be limited to a rain garden, ADA accessible ramps, and new entry drive from East Pike Street for service vehicles and staff parking.

Previous SEPA Related Actions

Prior to application for a Master Use Permit, Seattle Public Schools exercised its prerogative to act as lead SEPA agency. A Determination of Non-Significance (DNS) was issued by Seattle Public Schools on December 3, 2014. An appeal was registered and the appeal hearing was conducted. The Hearing Examiner Pro Tempore recommended to affirm to the SEPA official and the official accepted the affirmation on February 27, 2015.

The District submitted their MUP application (project number #3018266) to DPD for review on January 1, 2015. For the purposes of this permit application, exercise of substantive SEPA authority by the DPD is limited to conditioning only for impacts previously identified by SPS. Conditioning pursuant to this authority will rely on the threshold DNS issued by the District and on environmental documents prepared by the District.

Public Comments

Notice of the proposed project was published on January 5, 2015, and the required public comment period ended on February 9, 2015. Comments were received during the official public comment period. Comments focused on pointing out the high amount of existing traffic in the area and the existing lack of on-street parking. Commenters point out that the school use might increase bus and car traffic in the area and pose safety hazards. Commenters express concern for play area, trees, bus load and unload, parking amount, and other perceived impacts.

ANALYSIS - SEPA

The proposal's environmental impacts have been analyzed in environmental documents prepared by the Seattle School District. Documents include a SEPA Checklist dated November 2014 and a Determination of Non-Significance (DNS) issued by Seattle School District dated December 3, 2014.

Seattle Municipal Code (SMC) Section 25.05.660 provides that proposals can be conditioned in order to mitigate environmental impacts. All conditions must be related to impacts identified in the environmental documents, based on adopted policies, and must be reasonable and capable of being accomplished. This proposal is reviewed under that substantive SEPA authority.

The Department is reviewing the environmental impacts of the proposal in order to impose further conditions, if necessary. Disclosure of the potential impacts from this proposal was made in the environmental documents listed above. This information, supplemental information provided by the applicant (plans, written descriptions of the project, geotechnical report, transportation and parking report, construction requirements, arborist reports and renderings) and the experience of this agency with review of similar proposals form the basis of this analysis and conditioning.

The SEPA Overview Policy (SMC 25.05.665) establishes the relationship between codes, policies, and environmental review. Specific policies for specific elements of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority.

The overview policy states in part: *"Where City regulations have been adopted to address an environmental impact; it shall be presumed that such regulations are adequate to achieve sufficient mitigation (subject to some limitations)."* Under certain limitations/circumstances, (SMC 25.05.665.D.1-7) mitigation can be considered. Thus, a more detailed discussion of some of the impacts is appropriate.

Codes and development regulations applicable to this proposed project will provide sufficient mitigation for short and/or long term impacts. Applicable codes may include the Stormwater Code (SMC 22.800-808), the Grading Code (SMC 22.170), the Street Use Ordinance (SMC Title 15), the Seattle Building Code, and the Noise Control Ordinance (SMC 25.08), Puget Sound Clean Air Agency regulations, and city ECA regulations.

Environmental impacts were identified in the Seattle Public School environmental documents which can be found in the city's electronic file for this project 3015917 and at the City of Seattle Applicant Services Center floor 20 of Seattle Municipal Tower. Minor or short term impacts are identified in the SEPA checklist for air, plants, construction noise, and transportation. Possible impacts and minor impacts are discussed below.

Short Term Impacts

The following temporary or construction-related impacts are expected: decreased air quality due to increased dust and other suspended air particulates during construction and transport of materials to and from the site; increased noise and vibration from construction operations and equipment; increased traffic and parking demand from construction personnel traveling to and

from the work site; consumption of renewable and non-renewable resources; disruption of utilities serving the area; and conflict with normal pedestrian movement adjacent to the site. Compliance with applicable codes and ordinances will reduce or eliminate most adverse short-term impacts to the environment.

Earth

The project will require grading/excavation and construction permits. The existing Codes (The City of Seattle Stormwater Code, SMC 22.800, Regulations for Environmentally Critical Areas SMC 25.09, and the City of Seattle Grading Code SMC 22.170) provide authority to require appropriate mitigation for this project. Surface water controls (i.e. temporary interceptor swales, check dams, silt fences, etc.) will be constructed simultaneously with any clearing and grading for project development. Surface water and erosion control measures will be relocated or new measures will be installed so as site conditions change, erosion control measures remain in accordance with City of Seattle Best Management Practices (BMP) requirements during the construction period. No further conditioning or mitigation is warranted.

Grading/excavation

There will be some excavation and removal of material for the project. Approximately 340 cubic yards of excavation is expected. During grading and excavation City code (SMC 11.74) provides that material hauled in trucks not be spilled during transport. The City requires a minimum of one foot of "freeboard" (area from level of material to the top of the truck container) be provided in loaded, uncovered trucks which minimize the amount of spilled material and dust from the truck bed in route to or from a site.

The contractor will obtain the City of Seattle's Department of Planning and Development (DPD) approval that erosion control measures are in place and functioning and will maintain erosion control measures as earthwork and utility construction commences in accordance with City of Seattle standards, as part of building permit review. No further conditioning or mitigation is warranted pursuant to specific environmental policies or the SEPA Overview Policy (SMC 25.05.665).

Air Quality

Demolition, grading and construction activities each may create adverse air quality impacts in the surrounding area. The Puget Sound Clean Air Agency (PSCAA) regulations require control of fugitive dust to protect air quality. The Stormwater Code (SMC 22.800-808) and the Grading Code (SMC 22.170) regulate on-site grading activities and require that soil erosion control techniques be initiated for the duration of the work. Construction activities will include several measures to minimize impacts to air quality: The contractor chosen for the proposed project would be required to comply with the Puget Sound Clean Air Agency's (PSCAA) Regulation I, Section 9.15 requiring reasonable precautions to avoid dust emissions and Regulation I, Section 9.11 requiring the best available measures to control emissions of odor-bearing contaminants. The contractor will be required to comply with recommendations in the Washington Associated General Contractor brochure "Guide to Handling Fugitive Dust from Construction Projects." No further conditioning or mitigation is warranted pursuant to specific environmental policies or the SEPA Overview Policy (SMC 25.05.665).

Construction Noise

There will be some excavation and construction activities which may contribute to noise in the area and which could temporarily adversely affect the surrounding residential uses. The limitations of the Noise Ordinance are found to be adequate to mitigate potential noise impacts. Pursuant to the SEPA Overview Policy (SMC.25.05.665) and the SEPA Construction Impacts Policy (SMC 25.05.675 B), mitigation is not warranted.

Construction Vehicles and Construction Traffic

There will be a variety of construction vehicles required to prepare the building site and to support construction activities. As development proceeds, vehicles associated with construction of the building could temporarily adversely affect the surrounding residential uses. Truck trips are expected to number about 17 truckloads with 20 yard capacity. The District will require the selected contractor to develop a construction management plan (CMP) that addresses traffic and pedestrian control during school construction. It will define truck routes, lane closures, walkway closures, and parking disruptions, as necessary. To the extent possible, the CMP will direct trucks along the shortest route to arterials and away from residential streets to avoid unnecessary conflicts with resident and pedestrian activity. No further conditioning or mitigation is warranted pursuant to specific environmental policies or the SEPA Overview Policy (SMC 25.05.665).

Construction Parking

During construction, parking demand will increase due to additional demand created by construction personnel and equipment. It is the City's policy to minimize temporary adverse impacts associated with construction activities. Construction workers can be expected to arrive in early morning hours and to leave in the mid-afternoon. Surrounding residents generate their peak need for on-street parking in the evening and overnight hours when construction workers can be expected to have departed. To the extent possible, construction employee parking will be contained on-site. The SPS documents note that some construction workers may be required to park temporarily at an off-site location and be shuttled to the site due to lack of available on-street parking capacity. No additional conditioning or mitigation is warranted pursuant to specific environmental policies or the SEPA Overview Policy (SMC 25.05.665).

Greenhouse Gas Emissions

Construction activities including construction worker commutes, truck trips, the operation of construction equipment and machinery, and manufacture of the construction materials themselves result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, they are not expected to be significant due to the relatively minor contribution of greenhouse gas emissions from this project. No further conditioning or mitigation is warranted pursuant to specific environmental policies or the SEPA Overview Policy (SMC 25.05.665).

SPS has proposed mitigation to address short term impacts as described in the SEPA documents. The measures outlined in their environmental documents adequately address impacts. No further

conditioning of the short term impact elements of the project is warranted pursuant to SEPA policies.

Long Term Impacts

Long term or use-related impacts are also anticipated as a result of this proposal, including: increased surface water runoff due to greater site coverage by impervious surfaces; increased bulk and scale on the site; increased demand for public services and utilities; loss of plant and animal habitat; and increased light and glare. Compliance with applicable codes and ordinances will reduce or eliminate most adverse long-term impacts to the environment.

Greenhouse Gas Emissions

Operational activities, primarily vehicular trips associated with the project and the projects' energy consumption, are expected to result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, they are not expected to be significant due to the relatively minor contribution of greenhouse gas emissions from this project. No further conditioning or mitigation is warranted pursuant to specific environmental policies or the SEPA Overview Policy (SMC 25.05.665).

Earth

Temporary erosion and sedimentation control BMPs and construction water quality treatment measures will be installed to minimize erosion and to treat stormwater runoff during construction. BMPs specific to the site and project will be specified by SPS in the construction contract documents, and the construction contractor would be required to implement them. No conditioning or mitigation is warranted pursuant to specific environmental policies or the SEPA Overview Policy (SMC 25.05.665).

Air

Upon completion, the project will result in a decrease in air quality over existing conditions, especially at morning and afternoon peak loading and unloading periods, but similar to those when the school was more fully operational. The impact of the proposed project on air quality in the area is not anticipated to be significant. Therefore, no mitigation measures are required.

Plants

To accommodate the proposed improvements, approximately 18 trees will be removed including one exceptional tree. The landscape plan includes restoration and planting approximately 45 trees as noted in the landscape plans to mitigate loss of the exceptional tree and to create a quality planting plan. No further conditioning or mitigation is warranted pursuant to specific environmental policies or the SEPA Overview Policy (SMC 25.05.665).

Environmental Health

A Phase I Abatement and Finishes Removal process will be conducted to remove any toxic materials, such as asbestos containing materials, PCB containing light ballast, mercury -

containing fluorescent lighting tubes and switches, in advance of school demolition activities. Project specifications require adherence to all applicable local, state and federal regulations governing hazardous materials removal and disposal, eliminating public exposure. No mitigation is necessary or warranted.

Noise

Currently the school is used by the private Hamlin Robinson School. Reactivating the high school function at the site will introduce and increase new sounds reminiscent of the school when it was last in public school operation. The noise level is expected to be below established noise thresholds for residential zones. Therefore, no mitigation measures are required.

Historic Preservation

The City of Seattle has determined that preserving historic buildings and districts is important to the citizenry for retaining a living sense and appreciation of the past, and has established the Landmarks Preservation Board (LPB) to determine the historical and cultural significance of individual buildings and sites. T.T. Minor was design by Naramore & Brady and built in 1940. On May 8, 2014 the LPB issued a Denial of Nomination for the School.

According to the Washington State Department of Archaeology and Historic Preservation (DAHP), there are no recorded archaeological sites or cemeteries within or immediately adjacent to the project site. Based on DAHP's Statewide Predictive Model, the project site is classified as Moderately Low Risk for encountering precontact archaeological resources (DAHP, 2013). In the event that cultural resources are inadvertently discovered during the project, construction will be temporarily halted in the immediate vicinity of the identified resources and the City, DAHP, and Affected Tribes will be notified. Mitigation and/or avoidance measures will be negotiated with the City, DAHP, and other stakeholders. No further conditioning or mitigation is warranted pursuant to specific environmental policies or the SEPA Overview Policy (SMC 25.05.665).

Light and Glare

Exterior lighting on the site will be expanded and interior lighting will be noticeable during some dark hours during the school year. Exterior lighting around the school building is anticipated to remain similar to former conditions but with improved fixtures to reduce spillover and glare. New lighting will increase light impacts but new modern fixtures reduce spillover and glare and it is anticipated that the lights will be on timers to be activated only during school-related activities. With these controls in place no further mitigation is warranted.

Traffic and Transportation

Technical information regarding traffic impacts and projections for the school's re-opening is included in a Traffic Impact Analysis, prepared by Heffron Transportation, Inc. dated August 12, 2014. The Analysis is available for review on the DPD website at <http://www.seattle.gov/dpd/>.

The T.T. Minor School site has on-site parking located at the southwest corner south of the playground with 22 spaces. The project proposal is to accommodate 35 parking spaces on the northern part of the site.

The Seattle World School is estimated to generate an increase of about 105 trips per day; however it is expected to result in a slight decrease in morning and afternoon peak hour trips compared to the existing trips for the Hamlin Robinson School according to analysis in the Heffron report. Peak hours are anticipated to occur in the morning between 8:00 and 9:00 a.m. and in the afternoon between 3:00 p.m. and 4:00 p.m.

The following measures are proposed by Seattle Public Schools to reduce the traffic and parking impacts associated with the re-use of T.T. Minor school to house the Seattle World School. These measures are listed in the SEPA checklist as SPS mitigation measures, page 17 of the SEPA checklist.

1. The School District will work with SDOT to confirm the locations and signage of parent-vehicle and school-bus load/unload zones (assumed to be along the north side of East Union Street).
2. The School District will work closely with SDOT to integrate on-street school-bus load/unload zones, any designated parent-vehicles school-load zones, and on-street parking adjacent to the site with any future bicycle facilities including the recommended "cycle track" on E Union Street and the "neighborhood greenway" on 18th Avenue, E Pike street, and 17th Avenue.
3. School bus arrivals and load/unload times will be staggered and/or staged off-site in order to make use of the limited "School Bus Load" only space (room for about three buses) along E Union Street in front of the school (e.g. three school buses arrive, load/unload, and depart before the next three buses arrive, etc.).
4. Maximize available on-site parking capacity to accommodate daily parking demand generated by staff and volunteers. Explore options to lease nearby off-site parking and encourage staff and volunteers to use transit to access the site whenever possible.
5. The School District and school principal will establish a communication plan to educate staff, parents, and students about the access and parking challenges that will exist at the school. The effort will encourage school-bus and Metro ridership and carpooling and will discourage parent-vehicle drop-off and pick-up activity. The plan will define clear procedures and travel routes for parent vehicles, school buses, pedestrian, and loading zones.
6. The School District will coordinate with the Seattle Police Department to enforce school-zone speed limits near the site.
7. Due to the lack of on-street parking capacity near the site, it may be necessary for attendees of the occasional evening events to take alternative modes to the site (transit or non-motorized). For some events it may be appropriate to adjust the event schedules to reduce attendance (such as splitting the events), partner with other institutions in the site vicinity to use off-site parking (e.g., the Temple De Hirsch Sinai which owns the parking lot located west of the alley), or relocate events to another location that has adequate parking capacity if the demand cannot be accommodated on-site.

Seattle Public Schools has outlined the specific mitigation listed above to address possible impacts. The City of Seattle is charged to add additional conditioning if necessary. The mitigation listed above addresses any impacts as appropriate to address possible impacts. Therefore, no further mitigation is warranted.

DECISION - SEPA

The application is **GRANTED**.

CONDITIONS – SEPA

None.

Signature: retagonzales-cunneutubby for Date: March 26, 2015
Holly J. Godard
Senior Land Use Planner
Department of Planning and Development

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IMPORTANT INFORMATION FOR ISSUANCE OF YOUR MASTER USE PERMIT

Master Use Permit Expiration and Issuance

The appealable land use decision on your Master Use Permit (MUP) application has now been published. At the conclusion of the appeal period, your permit will be considered “approved for issuance”. (If your decision is appealed, your permit will be considered “approved for issuance” on the fourth day following the City Hearing Examiner’s decision.) Projects requiring a Council land use action shall be considered “approved for issuance” following the Council’s decision.

The “approved for issuance” date marks the beginning of the **three year life** of the MUP approval, whether or not there are outstanding corrections to be made or pre-issuance conditions to be met. The permit must be issued by DPD within that three years or it will expire and be cancelled (SMC 23-76-028). (Projects with a shoreline component have a **two year life**. Additional information regarding the effective date of shoreline permits may be found at 23.60.074.)

All outstanding corrections must be made, any pre-issuance conditions met and all outstanding fees paid before the permit is issued. You will be notified when your permit has issued.

Questions regarding the issuance and expiration of your permit may be addressed to the Public Resource Center at prc@seattle.gov or to our message line at 206-684-8467.